

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF ROSEMARIE RIDDELL BOGDAN IN OPPOSITION TO  
DEFENDANTS' *DAUBERT* MOTION TO PRECLUDE CERTAIN OPINIONS OF  
PLAINTIFFS' EXPERT RAMIN (RON) NAJAFI, Ph.D**

**Rosemarie Riddell Bogdan**, hereby certifies as follows:

1. I am an attorney at law within the State of New York and a partner with the law firm of Harding Mazzotti, LLP and serve as Court-appointed Plaintiffs' Steering Committee Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in opposition to Defendants' *Daubert* motion to preclude certain opinions of plaintiffs' expert Ramin (Ron) Najafi, Ph.D.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the [REDACTED]

[REDACTED]

3. Attached hereto as **Exhibit B** is a true and accurate copy of the [REDACTED]

[REDACTED]

4. Attached hereto as **Exhibit C** are true and accurate copies of the examination before trial transcripts of [REDACTED]

[REDACTED]

5. Attached hereto as **Exhibit D** is a true and accurate copy of [REDACTED]

[REDACTED]

6. Attached hereto as **Exhibit E** is a true and accurate copy of [REDACTED]

[REDACTED]

7. Attached hereto as **Exhibit F** is a true and accurate copy of [REDACTED]

[REDACTED]

8. Attached hereto as **Exhibit G** is a true and accurate copy of [REDACTED]

[REDACTED]

9. Attached hereto as **Exhibit H** is a true and accurate copy of [REDACTED]

IARC Sci. Publ 57, 353-363 (1984), IARC article by Loepky et al. entitled *Ester-Medicated Nitrosamine Formation From Nitrite and Secondary or Tertiary Amines*.

10. Attached hereto as **Exhibit I** are true and accurate copy of [REDACTED]

[REDACTED]

11. Attached hereto as **Exhibit J** is a true and accurate copy of [REDACTED]

[REDACTED]

12. Attached hereto as **Exhibit K** are true and accurate copies of excerpts of [REDACTED]

[REDACTED] *Purification of Laboratory Chemicals, Armarego, WLF (4<sup>th</sup> Edition 1996; 6<sup>th</sup> Edition 2009)*.

13. Attached hereto as **Exhibit L** are true and accurate copies of [REDACTED]

[REDACTED]

14. Attached hereto as **Exhibit M** are true and accurate copies of [REDACTED]

[REDACTED]

15. Attached hereto as **Exhibit N** is a true and accurate copy of the [REDACTED]

16. Attached hereto as **Exhibit O** are true and accurate copies of [REDACTED]

17. Attached hereto as **Exhibit P** is a true and accurate copy [REDACTED]

18. Attached hereto as **Exhibit Q** are true and accurate copies of [REDACTED]

19. Attached hereto as **Exhibit R** are true and accurate copies of [REDACTED]

20. Attached hereto as **Exhibit S** are true and accurate copies of [REDACTED]

21. Attached hereto as **Exhibit T** is a true and accurate copy of the [REDACTED]

22. Attached hereto as **Exhibit U** is a true and accurate copy of [REDACTED]

**HARDING MAZZOTTI, LLP**  
Attorneys for Plaintiffs

By: /s/ Rosemarie Riddell Bogdan

Dated: April 11, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Rosemarie Riddell Bogdan

Rosemarie Riddell Bogdan